

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

2017 DEC -5 PM 3:46

DEPUTY CLERK

UNITED STATES OF AMERICA

v.

LIMBIC PARTNERS, LLC

NO.

3-17CR-625-K

INFORMATION

The United States Attorney Charges:

General Allegations

At all times material to this Information:

1. Blue Cross Blue Shield of Texas (BCBS) was a private health benefit plan offered in the State of Texas that provided health care benefits to individuals enrolled for coverage under individual and group policies.
2. United Health Group was a diversified health care company and the largest single health insurance carrier in the United States. United Healthcare was an operating division of United Health Group that provided health care coverage and benefits services to individuals enrolled for coverage under individual and group policies.
3. BCBS and United Healthcare were "health care benefit programs" as defined by 18 U.S.C. § 24(b) during the relevant time.
4. To obtain payment from an insurance carrier, the provider or the provider's designee was required to submit claims to the insurance carrier that included, among other things: the provider's unique provider identification number, the patient's name, a

description of the service(s) rendered to the patient using standardized codes, the date and location the services were provided, and the amount claimed for payment.

5. BCBS and United Healthcare relied on provider(s) to submit true and accurate claims.

6. Anesthesia was the administration of a drug or gas to induce partial or complete loss of consciousness. An anesthesiologist, certified registered nurse anesthetist (CRNA), or an anesthesia assistant could provide anesthesia services.

Defendant and Related Parties

7. The defendant, **Limbic Partners, LLC (Limbic Partners)** was a management company with a place of business at 5605 N. MacArthur Boulevard, 10th Floor, Irving, Texas 75038.

8. Herbert Cleighton Brown was licensed with the State of Texas to practice medicine with a primary specialty in anesthesiology. He was a Managing Member of **Limbic Partners**.

9. Brian David Rudman was licensed with the State of Texas to practice medicine with a primary specialty in anesthesiology. He was a Managing Member of **Limbic Partners**.

10. Maulik Paresh Parikh was licensed with the State of Texas to practice medicine with a primary specialty in anesthesiology. He was a Managing Member of **Limbic Partners**.

11. Company A was the billing company for **Limbic Partners**.

Count One
Mail Fraud
(Violation of 18 U.S.C. §§ 1341 and 2)

12. The allegations set forth in paragraphs 1 through 11 of this Information are re-alleged and incorporated by reference as though set forth in full herein.

Scheme to Defraud

13. Beginning in April 2011 and continuing through April 2013, the defendant **Limbic Partners** did knowingly and intentionally devise and intend to devise a scheme to defraud Blue Cross Blue Shield and United Healthcare, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises.

Manner and Means of the Scheme

14. The scheme and artifice was carried out in the following manner and means, among others:

15. Brown, Rudman, and Parikh created **Limbic Partners**, which billed for out-of-network procedures that were performed by others. **Limbic Partners** provided services at select medical facilities in Texas and contracted with Company A to handle all of its billing.

16. **Limbic Partners** instructed employees of Company A to add anesthesiologists and CRNAs to claims when the anesthesiologist or CRNA did not provide the billed service.

17. **Limbic Partners** instructed employees of Company A to substitute credentialed anesthesiologists to claims when the providing anesthesiologist was not credentialed with the patient's insurance company and could not provide a covered, reimbursable service.

18. **Limbic Partners** caused to be submitted claims for anesthesia services that were impossible to perform because the CRNA was performing a procedure at another facility at the same time, travel between multiple facilities would be impossible, and the CRNA was not credentialed or authorized to perform services at the facility.

19. **Limbic Partners** caused to be submitted approximately \$3.4 million in false and fraudulent claims to BCBS and United Healthcare for which they were not entitled to reimbursement. BCBS and United Healthcare paid **Limbic Partners** approximately \$1,066,000 for these claims.

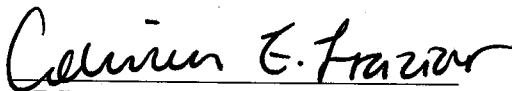
Execution of the Scheme

20. On or about the date set forth below, in the Dallas Division of the Northern District of Texas and elsewhere, **Limbic Partners**, aided and abetted by others known and unknown, for the purpose of executing the scheme described above, caused to be mailed through the United States Postal Service the following:

Count	Date	Description
ONE	February 27, 2012	Claim number 359689555801, for beneficiary B.D. mailed to United Healthcare

All in violation of 18 U.S.C. §§ 1341 and 2.

ERIN NEALY COX
UNITED STATES ATTORNEY

A handwritten signature in cursive script, reading "Adrienne E. Frazier".

ADRIENNE E. FRAZIOR

Assistant United States Attorney
Texas State Bar No. 24059546
1100 Commerce Street, Third Floor
Dallas, Texas 75242-1699
Telephone: 214-659-8600
Facsimile: 214-659-8805
Email: adrienne.frazier@usdoj.gov